Sunderland Public Transport Users Group

Campaigning for better bus, Metro and rail in Sunderland

Chairman: Alec McFadden · Secretary: Chris Lawlor · info@sptug.co.uk

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North East Bus Franchising Consultation Team
North East Mayoral Strategic Authority
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By email: HaveYourSay@northeast-ca.gov.uk

Dear Consultation Team,

Response to the North East Bus Franchising Consultation

We are writing to confirm that the enclosed document is the official response of the Sunderland Public Transport Users Group (SPTUG) to the consultation on the proposed North East Franchising Scheme for Buses. It was approved by members at our meeting on 21 September 2026.

SPTUG supports the proposed scheme. The current deregulated system has overseen years of decline, fragmented fares and information, unreliable services and weak accountability to the communities that depend on buses. In 2024/25, 51 per cent of operator revenue came from the public sector, yet the public still has little say over routes, timetables or fares. We do not think that arrangement can be defended.

We also recognise what franchising asks of the MSA. It moves financial, operational and reputational risk onto the public sector, and the independent assurance report points to real dependencies: the Delivery Body, depot acquisition, long-term funding, operator cost data and the demand gains assumed from branding. None of these defeats the case for franchising. All of them need to be dealt with openly and early.

Our response asks the MSA to put service quality, affordability, accessibility, employment standards and local accountability ahead of branding. Members were particularly clear on two points: buses must be genuinely accessible in practice, not merely compliant with the legal minimum, and the people who run the services must not lose pay, pensions or conditions through the transfer. The response also asks for protection for passengers, and for improvements, before franchising arrives. Washington is not due to join the scheme until September 2029 and the rest of Sunderland until September 2030, and the MSA's own modelling assumes services will keep shrinking in the meantime.

We would welcome the chance to discuss our response with officers, and we are content for it to be published.

Yours sincerely,

Alec McFadden
Chairman

Chris Lawlor
Secretary

Sunderland Public Transport Users Group

Enclosure: SPTUG response to the North East Bus Franchising Consultation

SUNDERLAND PUBLIC TRANSPORT USERS GROUP

Response to the North East Bus Franchising Consultation

Submitted September 2026 in response to the North East Mayoral Strategic Authority's statutory consultation on the proposed North East Franchising Scheme for Buses

Submitted by Alec McFadden, Chairman, and Chris Lawlor, Secretary

Our position

SPTUG supports the introduction of bus franchising across the North East.

Franchising would give the public control over routes, timetables, fares and service standards, which are the decisions that determine whether a bus service is any use to the people who rely on it. We attach conditions to our support. The scheme must protect services during the transition, secure long-term funding, publish measurable passenger outcomes, give user groups a formal role in decisions, protect the workforce, and deal with the delivery risks the independent auditor identified.

About SPTUG

SPTUG is a constituted, non-party-political group representing public transport users and workers in Sunderland and the surrounding area. The group is chaired by Alec McFadden, with Chris Lawlor as Secretary. We take part in the Sunderland City Bus Board and campaign for an affordable, accessible and integrated network, including better links for Washington and improved rail and Metro connections for the city.

Priority changes

The changes we consider most important are summarised below and explained in the detailed response that follows.

Priority	What we are asking for
Protect services during transition	Fix the baseline for the ten-year network commitment no later than the Mayor's decision, prevent cuts before franchising begins, keep fares and tickets identical across franchised and non-franchised services, and use the Enhanced Partnership to improve services now.
Long-term funding	Secure a multi-year revenue settlement and publish a downside plan that does not default to service cuts or above-inflation fares.
Passenger outcomes	Publish time-bound targets for punctuality, cancellations, mileage operated, affordability, accessibility, safety and satisfaction, reported by route and by local authority.
Local accountability	Amend Article 8 of the draft Scheme so user groups are consulted alongside Transport Focus, set up a standing Passenger and Accessibility Panel, and keep Local Bus Boards with a formal role in network reviews.
Accessibility	Require buses that are genuinely accessible in use, not just legally compliant, including space for larger powered wheelchairs, and one enforceable standard covering vehicles, stops, information, staff training and digital exclusion.

Priority	What we are asking for
Concessionary travel	Remove the 9.30am restriction as the first further investment, publish the calculations behind its estimated cost, and work towards 24-hour concessionary travel from age 60.
Workforce	Protect pay, conditions, pensions, continuity of employment and depot continuity, with recognised unions formally involved in transition and governance, no two-tier workforce, and proper welfare facilities for drivers.
Assets and competition	Settle depot acquisition and fleet arrangements before procurement, support small operators, and test whether Package B is too large for genuine competition.
Sunderland priorities	Use network reviews to improve evening and Sunday services and links to hospitals, jobs and education, and to integrate buses with the planned Washington Metro Loop and the Durham Coast Line.

Detailed response

We answer each question in the MSA's statutory questionnaire in turn, using its section headings and question numbers. Page references are to the Consultation Document (July 2026) unless we say otherwise.

Franchising Scheme

QUESTION 1

The proposed Bus Franchising Scheme would cover the entire area of the North East MSA, covering Tyne and Wear, Durham and Northumberland County Council areas. Do you have any comments on this?

We support a single scheme covering the whole MSA area. The region works as one travel market, with 175,000 people commuting between its local authority areas every day. A partial scheme would keep fares, information and accountability fragmented, and it would make it much harder to plan bus, Metro, rail and ferry as one network.

A regional scheme still has to answer to local places. The assessment itself notes that much of Sunderland, including Washington, has no Metro access (FSA Strategic Case, 2.9.41). For those communities the bus is the public transport network. Network reviews should weigh that dependence, and not just current passenger numbers, which reflect years of decline. The Delivery Body should publish service standards and performance data for each local authority, and keep local structures through which Sunderland residents, councillors, user groups and transport workers can influence decisions. Regional consistency should not become centralisation.

One small point. The introduction to the Consultation Document (page 3) lists North Tyneside twice and leaves Sunderland out. We assume this is a drafting error, and we would like it corrected in any republished version.

QUESTION 2

If the decision to introduce the proposed Bus Franchising Scheme is taken, it is anticipated that the first franchised services will be in place in Autumn 2029. Do you have any comments on this?

The timetable is understandable given the scale of procurement, depot acquisition, systems work and staff transfer. Our concern is what happens to passengers in the meantime.

The MSA's modelling assumes network mileage falls by 3 per cent a year in both options from 2025/26 to 2028/29 (Consultation Document, page 42). That adds up to a cut of around 11 to 12 per cent before the first franchised bus runs. The ten-year commitment to maintain the size of the network would therefore protect a network that has already shrunk. We ask the MSA to fix the baseline for that commitment no later than the date of the Mayor's decision, and to use its secured services budget and the Enhanced Partnership Code of Conduct to resist further cuts before then.

We welcome the decision to put the Washington and Riverside package in the first tranche in September 2029. Washington relies heavily on buses and has no direct Metro connection. The rest of Sunderland, in the Deptford, Sunderland and South Shields package, is not due until September 2030. The MSA should say what early improvements Sunderland can expect, and how it will stop services getting worse before that date.

Passengers should not have to wait until 2029, or 2030 in most of Sunderland, for anything to improve. The Enhanced Partnership is still in force and should be used now to improve accessibility, punctuality, passenger information and reliability, and to stop operators thinning out services ahead of the change. We also ask for an interim service protection plan covering the whole period from the Mayor's decision to full rollout, with commitments on supported services, fares, reliability, passenger information and operator conduct. No tranche should go live until an independent readiness review has confirmed that staff, vehicles, depots, ticketing, information and contingency plans are in place.

QUESTION 3

While the majority of services are included in the franchising scheme, some, such as some school services are not. Do you have any comments on this approach?

We accept narrow exemptions for closed-door school and SEND transport that is not open to the public. We also welcome the decision to keep registered school services that carry the public inside the scheme.

Exemptions must not create a parallel network with weaker standards. A pupil paying to use an exempt school bus in Sunderland should not pay more, or travel less safely, than a pupil on a franchised service in the next street. The MSA should explain how it will secure fare parity (at least with the franchised young person's fare), together with safeguarding, accessibility and vehicle standards on exempt services. Where the scheme itself cannot do this, local authority school transport arrangements should.

Permitted and exempt services should share data where the law allows, show clear passenger information and take part in integrated ticketing where appropriate. Community transport and demand-responsive services should appear in the single journey planner so that passengers can find them. The MSA should also watch whether the exemptions reduce useful capacity at school times, or harm small operators whose businesses combine school, local bus and private hire work.

Strategic Case

QUESTION 1

In the Assessment, we concluded that change is needed to deliver better buses in the North East. Thinking about the buses in the North East, what works well and what doesn't?

What works well

Buses are still the most used form of public transport in the North East, with 115.9 million journeys in 2024/25. Front-line staff keep a large and complicated network moving. The Mayor's

Fares, particularly the £2.50 adult single and the £1 fare for under-22s, have shown that public intervention can make travel simpler and cheaper, and the 8 per cent rise in passengers in 2024/25 suggests it works. Multi-operator day tickets and the Pop card point towards the integrated system passengers want. Many established routes provide essential links to work, school, healthcare, shops and family.

What does not work

The problems are structural. Since 2009/10, bus mileage in the region has fallen by 32 per cent and passenger journeys by 51.5 million. Passengers face around 370 different ticket types, inconsistent information, weak integration between operators and modes, thin evening and Sunday services, and very little influence over service changes.

Sunderland feels this more than most. Our own analysis shows the city has between 45 and 85 per cent fewer Metro stations per head than other Tyne and Wear boroughs, and Metro waits four to eight times longer than in Newcastle. Washington has no rail or Metro station at all. When the bus fails, there is no fallback. Our members repeatedly report unreliable services, missed connections and poor Sunday provision. They also raise the lack of accessible public toilets at interchanges, which is a real barrier for older and disabled passengers, and for drivers.

Reliability deserves particular attention. Only around 87 per cent of buses run on time, against a 95 per cent standard. The assessment notes that Newcastle–Sunderland is the least congested of 35 UK conurbations (FSA Strategic Case, 5.7.4). That suggests much of the unreliability comes from staffing, lost mileage and scheduling, all of which can be tackled directly through contracts.

Accessibility is where the gap between the rules and real life shows most clearly. A bus that meets the legal minimum is not always a bus our members can use. There is rarely more than one wheelchair space, wheelchair users and parents with buggies are left competing for it, doorways and turning space often do not suit larger powered wheelchairs, and boarding can depend on whether the ramp works that day.

Information is another weak point. Real-time displays and apps are frequently wrong, and buses disappear from tracking altogether, which leaves passengers with no way of telling whether a service is late or has been cancelled. Ticketing adds to the problem: members report recurring difficulties with the usability and reliability of the Pop card and Nexus systems, and there is still no simple automatic fare cap across bus and Metro.

A useful network should be judged by whether people can make everyday journeys at the times they need them: shift work, hospital appointments, evening classes. The number of routes on a map tells you very little.

QUESTION 2

The Strategic Case sets out a case for change which focuses on challenges such as a lack of consistency, integration, and accountability to communities, as well as issues regarding value for money and performance. Do you have any comments on the challenges identified in the Strategic Case?

We agree with the problems identified: inconsistency, poor integration, weak accountability, poor punctuality, safety concerns and questionable value for money. The strongest argument for reform is a simple one. In 2024/25, 51 per cent of operator revenue came from public funds, while operators kept control of the decisions that matter to passengers.

The case for change should give more weight to transport poverty, evening and Sunday gaps, workforce conditions, the state of stops and interchanges, and connections to new housing, jobs and healthcare. It should also recognise that decline has not hit everyone equally. People without cars, older and disabled people, young people and lower-income households pay the

highest price when a route is withdrawn or a connection fails. With 31 per cent of North East residents at risk of transport-related social exclusion, compared with 19.8 per cent nationally (Consultation Document, page 25), and Sunderland the 20th most deprived local authority in England (FSA Strategic Case, 2.9.40), this belongs at the centre of the case.

QUESTION 3

A number of strategic objectives have been developed to help compare the shortlisted delivery options (continuing with the Enhanced Partnership, and introducing the proposed Bus Franchising Scheme) in the Assessment. Do you have any comments on these strategic objectives for the North East's bus network?

The six objectives are broadly right, but they are not yet precise enough to hold anyone to account. The independent auditor reached the same view and recommended that objectives and measures be made specific, measurable and time-bound.

The MSA says targets can only be set once a baseline exists after the decision. That is fair for the targets themselves, but the measures should be published now. Before procurement starts, the MSA should publish baselines, targets and reporting dates for punctuality, cancellations, scheduled mileage operated, excess waiting time, affordability, passenger satisfaction, accessibility, perceived safety (broken down by sex, age and disability), patronage and emissions. Results should be reported regionally and by local authority, and by route wherever commercial confidentiality does not genuinely prevent it. A target such as the Traffic Commissioner's 95 per cent punctuality standard means far more than a general promise to improve.

We would also add an outcome under the objective to make the network accessible and inclusive to all: reducing the gap in access between places, so that communities without rail or Metro get priority that reflects how much they depend on the bus.

QUESTION 4

The potential impact of the proposed Franchising Scheme on neighbouring authorities, and the bus services in these areas, have been identified in the Strategic Case. Do you have any comments on these potential impacts?

Cross-boundary services should be treated as complete journeys. The proposed approach to the 35 cross-boundary services is sensible in principle, but passengers should not hit a cliff edge in fares, ticket acceptance, real-time information or concessionary validity at the MSA boundary. Links from Sunderland and east Durham towards Hartlepool and Teesside matter to our members.

The MSA should reach formal agreements with neighbouring transport authorities before procurement, publish how each affected route will be treated, and require permitted operators to provide real-time data and accept relevant integrated tickets. Changes should be judged by their effect on journeys to work, education and healthcare, and not only on the commercial network outside the area.

QUESTION 5

The Strategic Case concludes that franchising is best placed to deliver our strategic objectives for buses in the region, when compared to continuing with the current EP. Do you have any comments on this conclusion?

We agree. The Enhanced Partnership can deliver negotiated initiatives, but it cannot guarantee a stable network, integrated fares or public control of routes and timetables. The assessment projects that after ten years the EP would carry 25.7 million fewer journeys a year than franchising, with fares 22 per cent higher in real terms and 12.2 million fewer miles operated.

Over the full appraisal period, EP mileage falls by 51 per cent (Consultation Document, page 56). No partnership agreement can change the incentives behind that decline. Franchising can.

The conclusion should still be stated with care. The economic case says franchising will not, on its own, significantly change routes or infrastructure (page 46), and it leaves demand in 2038/39 only slightly above its 2028/29 level (page 44). As modelled, franchising stops the decline without reversing it. Growth will depend on what the MSA chooses to build once it has control. For the same reason, the MSA should keep open the option of a municipal operator where that would improve resilience, competition or value for money, which the Consultation Document confirms remains possible (page 32).

Economic Case

QUESTION 1

The Economic Case of the Assessment considers the impact of the proposed scheme on the economy, environment, operators, passengers, the MSA, and wider society compared to the current EP. Do you have any comments on these impacts?

We agree that a larger, cheaper and more reliable network should improve access to work, education, healthcare and leisure, and slow the growth in car traffic compared with the EP. This matters in Sunderland, where residents need reliable cross-city and cross-boundary links to reach major employers, hospitals and colleges. The benefits will be greatest where dependence on the bus and deprivation overlap, and 24.7 per cent of Sunderland's children live in low-income families (FSA Strategic Case, 2.9.40). The Mayor's decision report should show how benefits and fare savings are distributed by local authority and by level of deprivation.

The demand model's background growth factors give Sunderland the lowest figures of any district in the region for 2023 to 2059: 0.77 for commuting, 0.80 for business and 0.81 for leisure (FSA Appendix D, Table 5). In plain terms, the model expects Sunderland's bus market to shrink faster than anywhere else. We doubt that national forecasts reflect growth at IAMP, the manufacturing cluster around Nissan and Riverside Sunderland. Either way, network planning will need to work deliberately against that trend.

The assessment is also clear that the core scheme does not directly deliver route or infrastructure changes, and it rates franchising as neutral on regeneration and severance. That is an assumption the MSA can change. Serving new employment and housing sites from the day they open is one of the clearest advantages of public control. Network growth, bus priority, safer stops, zero-emission vehicles and integration with the Washington Metro Loop and the Durham Coast Line will need their own funded programmes.

Environmental benefits should be reported as actual changes in emissions and car mileage, and not only as an improvement on a declining EP. Employment impacts should cover job security, pay, training, fatigue and equality, rather than treating staff purely as a cost. The auditor also notes that crowding and congestion were not modelled. We ask for crowding to be monitored on Sunderland's busiest corridors at school and shift-change times from the first day of franchised operation.

QUESTION 2

The Economic Case concludes that the proposed Bus Franchising Scheme offers better overall value for money than the current Enhanced Partnership. Do you have any comments on this conclusion?

The central benefit-cost ratio of 1.86, and the social ratio of 2.83, support the conclusion that franchising offers better value than the EP. However, the Consultation Document overstates how secure that result is. Page 48 concludes that value for money is not significantly affected by

changes in key assumptions, yet the same page shows that reducing the demand uplift from branding and marketing pushes the scheme into the ‘low’ value for money category. The auditor describes that lower assumption as closer to its own professional view. Six percentage points of the modelled demand growth come from branding and marketing alone.

That does not change our overall view. Even at ‘low’ value for money the benefits still exceed the costs, and the EP’s weaknesses are built into it. But the MSA should say this plainly. It should not rely on a new livery to deliver benefits that have to come from punctual buses, useful routes, affordable fares and accurate information. It should publish annual comparisons of actual costs, passenger numbers and benefits against the forecasts, and use formal review points before each tranche and each contract extension.

Financial Case

QUESTION 1

The Financial Case has identified the estimated costs of introducing and operating the proposed Bus Franchising Scheme. Do you have any comments on these costs?

The costs are significant, but they should be set against the continuing public subsidy and managed decline of the current system. The updated Consultation Document puts transition costs at £85.65 million, including £26.61 million for quantified risk, with £35.8 million of investment needed before the first services go live. The additional investment need is £113.0 million over the first ten years and £437.8 million over 30 years.

We have three concerns. First, the auditor found a formula error that left £104.9 million of staff costs out of the 30-year figure. We welcome the correction, but a mistake of that size in a statutory assessment justifies publishing one reconciled model, explaining every change from the original, and having it checked again before the Mayor decides.

Second, the £26.6 million contingency is small next to the downside sensitivities, which add between £47.6 million and £160.6 million over ten years. The document is also inconsistent on the upper figure, giving £273.8 million on page 61 and £244.4 million on page 62.

Third, the transition budget allocates £11.37 million to branding and marketing and £2.94 million to passenger information (page 57). For passengers, accurate real-time information is worth far more than a new livery, and we would rebalance these figures.

QUESTION 2

A number of funding sources have been identified which could support bus services under franchising, including revenue from fares, the Integrated Settlement, and the transport levy, among others. Do you have any comments on the proposed sources of funding?

Fares, existing grants, the Integrated Settlement and the transport levy are all legitimate sources, but the long-term position is not secure. The current Integrated Settlement runs to 2030, while the financial model assumes a similar mechanism for the whole appraisal period. The MSA describes non-renewal as highly unlikely. That may well be true, but it is an expectation and not a safeguard. Sunderland’s main package would transfer in September 2030 and the final tranche in 2031, so the fully franchised network would start running after the current settlement ends. Reserves can absorb shocks, but they cannot pay for a permanent service.

We ask the MSA to seek a long-term government revenue settlement for buses, ring-fence bus funding within the Integrated Settlement for the ten-year commitment, and publish how council levies would be affected under central and downside scenarios. We would like Sunderland City Council and the other constituent councils to confirm that the levy will at least hold its value in real terms, given the assessment’s finding that it has fallen.

The MSA should also be open about the trade-off in converting 10 per cent of CRSTS capital into revenue, because that capital also pays for the bus priority and stop improvements the case relies on. Other locally raised sources, such as developer contributions, are worth examining. Above all, fares should not become the balancing item when funding falls short.

QUESTION 3

The Financial Case details a number of risks which could have a significant impact on the successful implementation of the franchising scheme. Do you have any comments on the assessment of risk to the Mayoral Strategic Authority in relation to the proposed franchising scheme?

The 21 risks cover most of the main threats, but listing a risk does not control it. The MSA should keep a public, high-level risk register with named owners, mitigations, trigger points and changes in exposure. Particular attention is needed for depot acquisition, setting up the Delivery Body, early operator withdrawal, fleet availability, weak competition, aggressive under-bidding, passenger shortfalls, cyber and payment system failures, and the loss of skilled staff.

We would add three risks. The first is further network cuts before franchising, which the model treats as a given rather than something to manage. The second is digital exclusion. The single app and website are central to the offer, and older and disabled passengers must keep full access through cash, paper timetables, a staffed phone line and travel shops. The third is a loss of public trust at launch. If a tranche goes live alongside timetable disruption or ticketing failures, confidence will fall quickly.

The auditor calls the Delivery Body and depot acquisition critical dependencies. No tranche should proceed until credible contingency plans exist for both, and a service continuity reserve and emergency operating plan should be in place before the first procurement. On risk 21, early engagement with affected groups, SPTUG is ready to help.

QUESTION 4

The Financial Case concludes that the proposed Bus Franchising Scheme is affordable, with the funding options identified providing a robust framework for addressing the investment need while allowing for flexibility in response to evolving financial conditions. Do you have any comments on this conclusion?

We consider franchising affordable in principle, but the conclusion is conditional. The central case relies on existing funding rising with inflation and on future funding that has not yet been secured, and the auditor considers the results sit towards the favourable end of what is realistic. The sensitivities raise the ten-year investment need substantially: to around £244 million if operating costs rise faster than expected, and to around £274 million if existing funding stays flat in cash terms.

Before making the scheme, the MSA should publish a funded medium-term plan, a downside scenario and an order of priorities for responding if costs run above forecast. That order should protect socially necessary services, evening and Sunday provision, concessionary travel, accessibility and services for communities without rail or Metro, before network cuts or above-inflation fares are considered.

The ten-year commitments on fares and network size are welcome. But the model assumes that after ten years fares go back to rising at RPI plus 2 per cent and the network goes back to shrinking. Passengers need to know what principle will govern the eleventh year. We ask for a public review of the commitments in year seven, so there is time to plan instead of a cliff edge.

Commercial Case

QUESTION 1

A number of commercial objectives have been developed by the MSA. Do you have any comments on these commercial objectives?

The commercial objectives are sound but incomplete. Passenger accessibility, employment standards, decarbonisation, open data and local accountability should be explicit commercial objectives, rather than left to other parts of the scheme. Best value should mean the best whole-life service for passengers and the public purse, not the lowest compliant bid.

Contracts should also measure and reward the quality passengers actually notice: driver customer care and disability awareness, clean vehicles, working accessibility equipment and accurate on-board information. A contract that rewards only on-time running will get on-time running and little else.

QUESTION 2

The Commercial Case describes the MSA's proposed packaging and transition strategies, with three tranches made up of a mix of 'large' and 'small' contract packages. Do you have any comments on this approach?

A mix of large and small contracts can balance coordinated operation with openings for smaller operators. Package B, covering the Deptford, Sunderland and South Shields depots, concerns us. It is the largest package, with a peak vehicle requirement of 190, and it brings both incumbent operators' Sunderland depots together. The assessment notes that Sunderland is the only place where large depots belonging to different operators overlap (FSA Commercial Case, 3.5.12). Putting both in one contract means one operator for most of the city, and a single point of failure for Sunderland and South Shields together. It may also attract only the largest bidders. The MSA should test whether splitting Package B would improve competition and resilience without a significant loss of efficiency, and publish safeguards against any one operator gaining too large a share across packages.

Sunderland will also sit across two tranches, with Washington from September 2029 and the rest of the city from September 2030. For a year, residents will be using two systems. Fares, ticket acceptance and information must be identical across franchised and not-yet-franchised services throughout that period, and the MSA should publish the criteria it used to decide the order of the tranches.

Letting around 20 per cent of the network as small contracts may widen participation, but a large number of route-level contracts must not fragment the service. All contracts should use the same standards for fares, information, accessibility, safety and employment, with coordinated timetables and guaranteed connections. The phased rollout should include learning reviews, and passengers in later tranches need interim protection.

QUESTION 3

The Commercial Case identifies a minimum mobilisation period of six months between a local service contract being awarded and services beginning to operate under this contract. Do you have any comments on the proposed minimum mobilisation period?

Six months may be enough for a small contract using existing vehicles and premises, but it should be treated as a minimum. Large packages that involve sourcing fleet, depot work, staff transfers, ticketing systems and route familiarisation may need nine to twelve months.

Contracts should set measurable readiness milestones and allow a launch to be postponed where safe, continuous operation cannot be shown. Passengers will judge franchising on its first

few weeks, and the pressure to hit a public launch date must never override operational readiness.

QUESTION 4

The MSA proposes that contracts will have a maximum length of seven-to-eight years, with a shorter guaranteed term (approximately five-to-six years). Do you have any comments on the proposed length of franchise contracts?

A guaranteed term of five to six years, extendable to seven or eight, is a reasonable balance between stability and regular competition. Extensions should be earned through published tests of performance, passenger satisfaction, workforce standards and social value. They should never be automatic.

Contracts should include break and step-in rights for sustained underperformance, insolvency or serious safety failures, together with fair mechanisms for changes that come out of network reviews. They should not be so rigid that changing a timetable or improving a route becomes prohibitively expensive.

QUESTION 5

Operators are assumed to provide the vehicles under franchising which will be required to comply with an industry-standard specification set by the MSA. To facilitate this approach the MSA will operate a Residual Value Mechanism, lowering the barrier to entry for non-incumbent operators and reducing the risk of operators being left with stranded assets at the end of a franchise contract. Do you have any comments on this approach?

An operator-provided fleet backed by a Residual Value Mechanism may lower barriers to entry, but the mechanism is not yet defined well enough. The auditor warns that it could leave the MSA liable for the value of vehicles if the network shrinks. The rules on valuation, condition, transfer, financing and zero-emission compatibility should be published before tenders go out.

The MSA should also compare this approach with public ownership or leasing of the fleet. That could improve consistency, lower barriers to entry and support coordinated decarbonisation, although it would need capital and asset management capacity. The choice should rest on whole-life cost and resilience rather than short-term balance sheet convenience.

We are concerned that the assessment assumes no improvement in vehicle standards compared with the EP (page 66). Franchising is the chance to raise the minimum, and the test should be whether a bus is genuinely usable, not whether it clears the legal bar.

The specification should require: more than one wheelchair space on high-demand routes, and a flexible bay so that wheelchair users and parents with buggies are not competing for the same space; door widths and internal turning space that suit larger powered wheelchairs and mobility scooters, which many current buses do not; reliable ramps, with a duty on operators to report and fix failures; audio-visual next-stop announcements on every vehicle from the first day of each contract; CCTV; and interiors designed for an ageing population. Disabled passengers and their organisations should help set the specification and test vehicles before they enter service.

QUESTION 6

The Commercial Case assumes that 12 existing ‘strategic’ depot sites are acquired by the MSA for use by operators of ‘large’ contracts, with ‘small’ contract operators expected to provide their own depot sites. Do you have any comments on the approach to depots under the Proposed Franchising Scheme?

Public control of the 12 strategic depots is central to making competition possible, and all three of Sunderland’s strategic depots, at Deptford, Sunderland and Washington, are included. We support acquisition in principle. However, the auditor found that the fallback options, including compulsory purchase, have not been shown to be legally and practically deliverable. A detailed

acquisition plan, with valuations, the legal route, a timetable and a fallback for every site, should be approved before any procurement that depends on it begins.

Depot planning should protect continuity for workers, include charging and power for zero-emission fleets, and avoid unnecessary dead mileage. Small operators should have access to shared or satellite facilities where needing their own depot would keep them out of the market.

Driver welfare should be treated as part of service planning rather than an afterthought. Suitable toilets, rest areas and welfare facilities should be specified at depots, termini, interchanges and appropriate points along longer routes, and their provision should be a contract standard. A driver who cannot reach a toilet at the end of a trip is a reliability problem as well as a question of basic dignity.

QUESTION 7

The Commercial Case highlights various opportunities to facilitate the involvement of small and medium-sized operators (SMOs) in the North East bus market under franchising. Do you have any comments on how the scheme would support or affect small and medium-sized operators?

The move from 13 per cent of the network procured as secured services today to around 20 per cent in small contracts could be positive. Several small operators run secured services in Sunderland, and their local knowledge is valuable. But the auditor found that operator data was inconsistent and that the different cost base of small operators had not been fully assessed.

The procurement plan should use proportionate financial and qualification thresholds, prompt payment, sensible bid security, accessible procurement support, and room for consortia or subcontracting without lowering employment standards. Ticket machine and other technology requirements should not become a barrier. The MSA should track the share of contracts and mileage won by smaller operators, and avoid a process that pushes out viable local firms and ends up reducing competition. Community transport providers should be involved, and their services shown in Angel Network information.

QUESTION 8

Under the proposed Bus Franchising Scheme, revenue risk would be retained by the MSA, with cost risk transferred to operators. Do you have any comments on the proposed allocation of risk between the MSA and operators?

It is right for the MSA to hold revenue risk, because it will control the main levers on demand: fares, the network, information and marketing. Operators should manage the costs they control, while inflation and changes the authority directs need fair indexation and change mechanisms.

The MSA must guard against unrealistically low bids. That means open-book provisions, financial monitoring, performance bonds or parent company guarantees where proportionate, and credible plans for operator failure. Cost pressure must not resurface as missed mileage, unsafe staffing or poor maintenance. The performance regime should cover lost mileage and missed first and last journeys, and not just punctuality. We also propose a published Passenger Charter with real redress, for example when the last bus of the day fails to run, so that passengers share in the benefit of contractual accountability.

QUESTION 9

The Commercial Case concludes that – while both the proposed franchising scheme and the existing EP are commercially viable options – franchising performs better against the commercial objectives. Do you have any comments on this conclusion?

We agree. Competitive tendering for defined services is more transparent than relying on local monopolies and negotiated reimbursement, and it allows clearer accountability and consistent standards across the network.

The conclusion still depends on unresolved questions about depots, fleet, the Delivery Body's capacity and the number of credible bidders. The MSA should publish a non-confidential summary of its market testing, along with indicators of competition, before procurement begins.

Management Case

QUESTION 1

The Management Case sets out how the proposed Bus Franchising Scheme would be managed and what competency and resource is required. Do you have any comments on the delivery arrangements set out to deliver and manage franchising, such as if adequate capability and capacity is identified?

A steady-state Delivery Body of about 160 full-time posts is plausible, but recruitment and organisational design are major risks. It will take on network planning, fares, information, customer contact and contract management for around 317,500 passengers a day, so its resourcing should be benchmarked against authorities already running franchised networks. Customer-facing teams, including the contact centre, complaints and disruption information, need protecting, because that is where passengers will judge it.

The auditor describes the Delivery Body as a material dependency outside the scope of the assessment. Its legal form, governance, budget, senior appointments, systems plan and workforce strategy should be settled early, published for comment and subject to independent gateway review. It will also need practical passenger knowledge alongside commercial and technical skills. Recognised user groups, disabled people's organisations, workforce representatives and local authorities should help shape service standards, testing and readiness reviews, and passengers should be represented in its governance.

QUESTION 2

The Management Case describes the arrangements proposed for the potential transfer of bus industry employees to new operators. Do you have any comments on these arrangements?

We support TUPE protections and the aim of keeping depot continuity. With around 4,000 employees potentially affected, trade unions should be formally involved from the start in defining who is principally connected to services, and in workforce information, pensions, training and transfer arrangements.

Pay, terms and conditions, continuity of employment, collective agreements and pension rights should all be protected, with proper TUPE protections applied rather than a minimum reading of the law. The Real Living Wage should be a floor, and the scheme should rule out a two-tier workforce, fire and rehire, insecure scheduling and the use of subcontracting to get round standards. Welfare facilities, covered in our answer on depots, belong in the same category.

Recognised trade unions should be formally involved in the transition, and should have a standing place in the governance of the franchised network rather than being consulted when it suits. This is a passenger issue as well as a workforce one: recruitment, retention and fatigue have a direct effect on reliability and safety.

QUESTION 3

In the Management Case the MSA has identified a number of activities which would have to take place during the transition to franchised services. Do you have any comments on the activities identified, and the proposed timeline?

The activities identified are broadly complete, but the programme is ambitious. The MSA should publish a critical path showing the latest safe dates for the Delivery Body, depots, systems,

procurement, TUPE information, fleet and passenger communications. Each tranche should have a public readiness statement and a tested continuity plan.

Communications must be accessible and start well before launch, through non-digital channels as well as online. Passengers need to know what will change, what will stay the same, which tickets are valid and where to get help, and there should be a single point of contact for complaints during transition. SPTUG and the Sunderland City Bus Board should be involved in testing plans for both the Washington tranche in 2029 and the Sunderland tranche in 2030, including the new app, website and passenger information before they launch.

QUESTION 4

The Management Case has set out a five-step process to manage performance and ensure that the anticipated benefits of the proposed Bus Franchising Scheme are realised. Do you have any comments on how the MSA would monitor and evaluate the performance of the proposed Bus Franchising Scheme?

The five-step process is a useful framework, but it needs firm measures, publication rules and consequences. This matters all the more because the Traffic Commissioner's role in enforcing punctuality falls away for franchised services (Consultation Document, page 92). Accountability will rest with the Delivery Body's own contract management, so the public needs to be able to see the results.

A public dashboard should report, as a minimum, scheduled and operated mileage, cancellations, punctuality, excess waiting time, missed connections, crowding, vehicle condition, accessibility failures such as ramp faults and unavailable wheelchair spaces, safety incidents, complaints and response times, fares, passenger numbers and satisfaction. Data should be published at least quarterly, and monthly where possible, as open data broken down by route and local authority. Baselines and targets should be fixed before the first procurement and independently audited.

The quality of real-time information should itself be measured and enforced. Members regularly see buses vanish from tracking, or displays that bear no relation to what turns up. Contracts should require accurate vehicle location data at all times, with a published measure of tracking coverage and accuracy and penalties where it fails. The same applies to ticketing: the problems members experience with the Pop card and Nexus systems should be designed out before the new arrangements go live, not inherited.

Contract deductions should be published and, where practical, reinvested in passenger improvements. An independent annual report on how well the scheme is working should go to the MSA's Overview and Scrutiny Committee. Passenger surveys should include people who cannot currently use the bus, and not only existing customers.

QUESTION 5

A governance structure has been proposed which details where responsibility for different aspects of the franchised bus network would rest, and the ways in which local authorities would be able to influence the franchised network. Do you have any comments on the proposed governance arrangements?

This is our most important concern. Cabinet oversight and local authority representation matter, but they do not replace direct accountability to passengers.

Under the Enhanced Partnership, passenger groups sit on the North East Bus Partnership Board and Local Bus Boards give communities a forum on network changes. Under franchising, the Consultation Document describes engagement as complaint handling, contract management, liaison with local authorities and consultation with Transport Focus at least every 36 months (page 88). Article 8 of the draft Scheme names Transport Focus as the only required

consultee. The assessment mentions new forums and stakeholder panels (FSA Strategic Case, 9.4.6), but nothing in the draft Scheme commits to them. Taking public control of the network should strengthen the passenger voice. It should not reduce it to the legal minimum.

We ask the MSA to:

(a) amend Article 8 of the draft Scheme to name passenger bodies, including local bus user groups, alongside Transport Focus, and to consult more often than every 36 months;

(b) set up a permanent Passenger and Accessibility Panel with representatives from recognised user groups across the region, including SPTUG and organisations of disabled people, with a formal role in network reviews, in setting accessibility standards and in scrutinising performance;

(c) keep effective Local Bus Boards under franchising, including in Sunderland, alongside that regional panel, with a clear remit, regular meetings, published papers and minutes, and a formal right to make recommendations to the Delivery Body and Cabinet;

(d) publish an enforceable standard for network changes, setting minimum notice, consultation and equality assessment requirements and a reasoned response to what people say, to replace the voluntary Code of Conduct; and

(e) give recognised trade unions a formal place in the governance arrangements, alongside passengers and local authorities.

Delegated powers for minor changes must be tightly defined, so that significant cuts cannot be presented as operational adjustments.

QUESTION 6

The management case concludes that both the existing EP and the proposed franchising scheme are deliverable, with franchising requiring additional investment, transition activity and governance arrangements to enable successful operation. Do you have any comments on this conclusion?

We agree that franchising is deliverable and offers much greater public control, provided the material dependencies are resolved: the Delivery Body, depot acquisition and funding beyond 2030. Transition risk is not a reason to keep a failing structure, but political commitment should not lead the MSA to play down the size of the task.

The decision should come with a funded delivery plan, independent assurance gates, and transparent reporting to Cabinet, scrutiny committees, local authorities, unions and passenger representatives.

Equality, Accessibility & Inclusion

QUESTION 1

Do you have any comments on the findings of the full Equality Impact Assessment?

The assessment rightly identifies that older people, disabled people, young people, women, ethnic minority communities and lower-income households are more likely to depend on buses or face barriers to using them safely. The scheme therefore has real potential to advance equality, and some of it should not wait for franchising: the Enhanced Partnership can deliver accessibility improvements now. But the assessment was prepared before consultation, and much of it describes who should be consulted rather than what needs to change. We ask for it to be updated with consultation evidence and local authority analysis before the Mayor's decision. In particular:

Fostering good relations. The assessment marks this as 'N/A', yet it is one of the three parts of the Public Sector Equality Duty. The assessment's own evidence of rising race, religious and

transphobic hate crime, and of ethnic minority passengers changing how they travel after the 2024 disorder, shows it is directly relevant. In November 2025, regional transport officers endorsed SPTUG's proposal to survey Metro passengers about their experience of discrimination. We ask for a similar survey on the bus network, with the results shaping the Angel Network's safety measures.

Pregnancy and maternity. The assessment says these are unlikely to have a significant impact on bus use. We disagree. Step-free boarding, space for wheelchairs and buggies, priority seating, driver behaviour, waiting conditions and access to health services are all plainly relevant.

Digital exclusion and transition. Neither is assessed. Older and disabled people are more likely to be digitally excluded, and changes of operator, timetable and ticketing across three tranches will affect them, and lower-income passengers, the most.

Accessibility standard. The test our members apply is whether a disabled person can actually make the journey, not whether the bus meets the legal minimum. In practice there is rarely more than one wheelchair space, wheelchair users and parents with buggies compete for it, and door widths and turning space often do not suit larger powered wheelchairs. The final scheme should include one enforceable accessibility standard, developed with disabled and older passengers and their organisations. It should cover wheelchair space and priority, door widths and internal layout, working ramps, audio-visual announcements, stop and interchange design (including accessible toilets at the principal interchanges the Delivery Body will take over from Nexus), readable and audible information, staff training, assistance, complaints, cash and non-smartphone payment, safe waiting areas and support during disruption. Equality impacts should be monitored throughout procurement and operation, with published action plans.

Concessionary travel. Concessionary passes account for 26 per cent of all bus journeys (FSA Commercial Case, 3.7.6). Removing peak-time restrictions and harmonising local enhancements across the region is costed at £8.4 million to £10.2 million a year (Consultation Document, page 36), the cheapest of the further investment options. Time restrictions hit older and disabled people who attend early appointments, work, volunteer or care for others. We ask for removal of the 9.30am restriction to become a funded commitment, and for the MSA to work towards 24-hour concessionary travel from age 60, which remains our policy. We also question the cost. The range given is wide and unexplained, and reimbursement is designed to leave operators no better and no worse off. Many of the journeys involved would otherwise be made slightly later in the morning rather than being new. We ask the MSA to publish the calculation, the assumptions behind it and how sensitive it is to them, separating the cost of removing the time restriction from the cost of harmonising other local enhancements. We also ask the MSA to reconcile the assessment's different forecasts for the fall in concessionary journeys (22 per cent, 33 per cent, and 43 per cent after the auditor's correction), given how much they matter to these passengers.

Final Questions

QUESTION 1

Do you support the introduction of the proposed Bus Franchising Scheme in the North East? Please explain why.

Yes. Franchising is the best available route to democratic control of fares, routes, timetables, information and performance standards. The current system combines heavy public subsidy with little public control, and it has not stopped the network's long decline. Sunderland, where so many people depend entirely on the bus, would bear more than its share of further decline under the Enhanced Partnership. Only a single public planner can properly integrate buses with Metro and rail, including the planned Washington Metro Loop.

Our support is firm. The changes set out in this response are what will turn a change in governance into something passengers can feel.

QUESTION 2

Are there any changes you think would improve the proposed Franchising Scheme?

The changes we consider most important are:

1. Protect passengers during transition by fixing the network baseline no later than the Mayor's decision, preventing cuts before franchising, and keeping fares and tickets identical across franchised and non-franchised services.
2. Secure long-term revenue funding and publish a downside plan that protects services and affordability.
3. Publish measurable, time-bound passenger outcomes and quarterly route-level data on punctuality, reliability and cancellations, and measure the accuracy of real-time information.
4. Amend Article 8 of the draft Scheme, create a standing Passenger and Accessibility Panel, and keep Local Bus Boards with a formal role.
5. Settle the Delivery Body, depots, vehicles and systems before procurement reaches a point of no return, with risk-based mobilisation periods and an independent readiness check before each area goes live.
6. Require genuinely accessible buses rather than legally compliant ones, with enough wheelchair space, and doors and layouts that suit larger powered wheelchairs, under one enforceable standard covering vehicles, stops, information and staff training.
7. Protect pay, terms, pensions, continuity of employment and depot continuity through proper TUPE protections, with recognised unions formally involved in transition and governance, and proper welfare facilities for drivers at depots, termini and along routes.
8. Test whether Package B is too large for genuine competition, and make sure small contracts do not fragment the passenger experience.
9. Remove the 9.30am concessionary restriction as the first further investment, publish the calculations behind its estimated cost, and work towards 24-hour travel from age 60.
10. Use the Enhanced Partnership to deliver improvements now rather than waiting until 2029 or 2030: accessibility, punctuality, reliable real-time information, simple integrated ticketing with automatic capping across bus and Metro, and evening and Sunday services in Sunderland.

QUESTION 3

Do you have any further comments?

Franchising is a way of running the bus network, and it will only be as good as the decisions made with it. Passengers will judge it by whether the bus turns up, whether the fare is affordable, whether they can make the journey safely, and whether someone is accountable when things go wrong.

For Sunderland, franchising should support a properly integrated network linking buses with Metro and rail, including the planned Washington Metro Loop and improvements to the Durham Coast Line. Network reviews should strengthen links to hospitals, colleges, employment sites and communities with weak evening and Sunday services, and automatic multi-modal fare capping, ticketing that works reliably, and coordinated timetables at Park Lane Interchange and Sunderland station should be in place from the start.

SPTUG is ready to work constructively with the Mayor, the MSA, Sunderland City Council, Nexus, transport unions, operators and other user groups through design, transition and operation. That includes testing passenger information and helping to reach older, disabled and digitally excluded passengers, who are the least likely to answer an online consultation. Our involvement should be formal and continuous, and able to influence decisions before they are settled.

Evidence reviewed

- North East Mayoral Strategic Authority, Bus Franchising Consultation Document, July 2026.
- North East Mayoral Strategic Authority, Franchising Scheme Assessment (including Appendix D, Model Specification Report), March 2026.
- Grant Thornton UK Advisory & Tax LLP, Independent Assurance Report, 16 June 2026.
- North East Mayoral Strategic Authority, MSA Response to the Independent Assurance Report, 2026.
- North East Mayoral Strategic Authority, The North East Franchising Scheme for Buses (draft Proposed Scheme), 2026.
- North East Mayoral Strategic Authority, Bus Reform – Full Equality Impact Assessment, March 2026.
- North East Mayoral Strategic Authority, Notice of Proposed Bus Franchising Scheme, 6 July 2026.
- Sunderland Public Transport Users Group, constitution, meeting records and connectivity analysis.
- North East Sustainable Transport Coalition, joint response to the North East Local Transport Plan consultation.